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Memorandum

Date:

July 14, 2004

TO

Elizabeth Leland, Project Manager

Directorate for Economic Analysis

THROUGH:

Hugh M. McLaurin, Associate Executive Director.

Directorate for Engineering Sciences

Robert B. Ochsman, Director, Division of Human Factors

Directorate for Engineering Sciences

FROM

Hope E. Johnson, Engineering Psychologist, Division of Human Factors

Directorate for Engineering Sciences

SUBJECT:

Human Factors Issues Related to All-Yerrain Vehicles and the partial ban

requested by Petition CP-02-4/HP-02-1.

I. Introduction

The Consumer Federation of America petitioned the U.S. Consumer Product Safety Commission (CPSC) to ban the sale of adult All-Terrain Vehicles (ATVs) intended for the use of children under 16. It has long been the position of the CPSC that children under 16 years old do not possess the developmental skills to safely ride adult ATVs, some of which weigh up to 850 pounds and reach speeds of upwards of 60 miles per hour (mph). Recent CPSC staff studies have shown that many children are riding adult ATVs, and that the injury and death rates are climbing. This memorandum will discuss various factors that may contribute to youth use of adult ATVs.

II. Effectiveness of Partial Ban

The likely effectiveness of a partial ban in terms of the sales of ATVs is beyond the scope of human factors; however, the likelihood of consumers following the intended purpose of the ban is a behavioral issue. Generally, personal experience outweighs a warning when the two conflict; however, a message from a highly credible source may discredit personal experience (Ayers, Gross, Wood, Horst, Beyer, and Robinson, 1989). Currently, consumers are subject to conflicting messages. The warning label clearly states "never operate this ATV if you are under 16;" however, personal experience may include witnessing children on adult ATVs appearing to suffer no harm and hearing from credible organizations and sales personnel that adult ATVs may be safe for children. It is likely that if the message that children under 16 should not operate adult ATVs was clearly associated with the U.S. Consumer Product Safety Commission, some

¹ See "ATV Age Guideline Monitoring", Topka-Ivins, T. (2003)

consumers may put more faith in it than currently, but many others may not². There is, however, little research that indicates consumers would view a government warning as more credible than others. The message would be most effective if all organizations related to ATV driving and safety promoted the same message.

A partial ban on the sale of ATVs intended for use by children under 16 may be compared to other partial bans enacted by other federal, state, and local agencies. For example, the sale of cigarettes and alcohol to children under 18 and 21, respectively, are the two best-known partial bans. Clearly the sale of these products to children has been reduced by ban enforcement, yet adolescents still smoke and drink alcohol. Approximately 80% of smokers start smoking before age 183, when it becomes legal to purchase cigarettes. Clearly these smokers were obtaining cigarettes before they could legally purchase cigarettes. Teen smoking rates dropped steadily for approximately 15 years, but began rising again in 1992 and recently were estimated to be 50% higher than the adult smoking rate (Gruber, 2000). This results partially from an adolescent's desire to do things adult-like and off limits. Gruber (2000) found that public policy regarding the sale of cigarettes to minors has reduced⁴, but not eliminated, the quantity of cigarettes smoked. ATV use does not directly correlate with smoking and alcohol use because ATVs are nonaddictive, considerably more expensive and may be easier to keep from children by locking away keys or other measures; however, it does show that other partial bans have had mixed results. Additionally, many adults may not be persuaded by a partial ban and may still allow their children to drive or ride on an ATV, and many children may gain access to an ATV some other way.

III. Injury Data Analysis

Simply preventing children under 16 from driving or riding on ATVs would drastically reduce the number of deaths and injuries to children; however, the Commission cannot control the use of ATVs. The petition requests that the CPSC ban the sale of adult-sized ATVs intended for the use of children under 16, which requires knowledge of the intended use of the ATV at the time of purchase. Data on intended use at the time of purchase, including the extent to which adults purchase ATVs for use by children, are unavailable at this time. According to the petitioners, one benefit of the ban, however, would be to raise awareness of the CPSC position that children should not ride on adult ATVs. Current awareness of this recommendation can be inferred by analyzing adult supervision and permission. CPSC staff closely analyzed 184 in-depth investigations (IDIs) of children's ATV related deaths from 1999 and 2000 to determine if the children were supervised by an adult or parent and if the children had permission to ride⁵. In most cases, the question of permission was difficult to determine. Therefore, staff often looked to other factors to determine if there was an "implied" permission. If an adult was present, generally it was assumed the child had implied adult permission to ride, unless something contradicted this. In 61% of the cases, it was impossible to determine permission from the information contained in the IDIs. Staff determined that children had permission to ride in 34%

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² Public comments on petition, number 7, 11, 17, 18, 20, 27, 51

³ http://www.cdc.gov/tobacco/research_data/youth/init.htm

⁴ Research varies from a 50% reduction to "limited impact." (Gruber, 2000, pp 8-9)

⁵ Full methodology and analysis in "Risk of ATV Riding Compared to Other Activities and Staff Response to Comment #71 on CPSC Petition 02-4/HP 02-1", Ingle, R. L. (2004).

of the 184 cases, while nine of the children specifically did not have permission to ride (Ingle, 2004).

If the petitioners' request had been in effect during the time period studied, it is unlikely the raised awareness would have had any effect on the nine child fatalities when the child did not have permission to ride the ATV, as he or she was already disobeying the parent or adult. The only way to prevent these deaths would be a mechanism that somehow prevents a child under 16 from starting the ATV. The group that might have been reduced by the petition's proposed ban are those children who had permission and a percentage of those children that are categorized as "unknown" where the child may have had permission that was not evident in the IDI. CPSC staff cannot determine whether these unknowns involve granted permission or not, nor can staff assume that every case with permission would have changed to no permission if there was a ban. Public comments show there is a subset of adults who would not heed the guidelines provided by the CPSC, and who would have allowed the child to ride the adult ATV anyway. While some adults would follow the government's suggestion and not allow children under 16 to ride ATVs, others would likely not follow CPSC recommendations, and staff cannot determine the percentages of any category. Therefore, it is impossible to determine if the outcome of these 184 deaths might have been affected had the petition's proposed ban been in effect at the time.

IV. Specific Comment Responses

Federal Register notice Vol. 67, Number 202, p.64353-64354 allowed for public comment to Petition CP-02-4/HP-02-1. Several comments warrant further discussion.

Safety Messages

Public comment #37 discussed how two well educated parents ignored the safety messages they had seen and heard, but let their child drive an adult ATV anyway. The message from the CPSC and ATV manufacturers appears in the owners' manuals and product warning labels on the ATV. This message is that no one under the age of 16 should ride an adult ATV. Yet this clear message is routinely ignored by many users, as evidenced by the number of deaths and injuries and the CPSC exposure study (Levenson, 2003), and is challenged by groups that may be viewed as authority sources^{7,8}. When personal experience conflicts with a warning message, it is generally the warning message that is discredited and ignored (Ayers, et al, 1989). Since ATV drivers may see children under 16 riding without injury, and organizations that are deemed reputable advise against following the message, the warning message against children under 16 driving may not be perceived as credible and will likely continue to be routinely ignored.

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⁶ Views expressed in comments 11, 17, 18, 20, 27, 50, and 51

⁷ "Consider NOT telling the dealer that your youths will be operating the ATV." Michigan ATV Association, http://www.miatvassoc.com/rider_safety_training.htm [visited July, 2003]. By May, 2004, the site had been updated to state "The only effective way we know of, to avoid 'confrontation' with your dealer, is to not discuss youth operation of the ATV," available at http://www.michiganatv.com/atv.php

⁸ National 4H generally supports the CPSC age recommendations; however, they recognize children ride ATVs larger than recommended and also advocate fitting children anthropometrically to a machine. (Burklow, Konya, and Cropper, 1996)

Long seat and passengers

Public comment #56 mentions that despite warnings and public safety campaigns, children are observed as a second passenger on the driver's lap or behind the driver. Most ATVs are equipped with a seat that is much longer than a single driver appears to need. This seat resembles the long seats on snowmobiles and motorcycles, which are designed for multiple passengers; however, the ATV seat is designed to allow the driver to shift his or her weight while riding. Many consumers may assume that the seat is made longer so that the seat can fit an adult and a child or two children together. The passenger may severely limit the driver's ability to shift his or her weight by limiting the available space on the seat, therefore affecting stopping and turning. Also, the driver cannot accurately predict the handling of the ATV with the additional weight and movements of a passenger; therefore, it would be virtually impossible to practice proper active riding. Additionally, since driving an ATV takes the full attention of the driver, a passenger may distract the driver. The required warning labels against passengers are similar to those warning against children under 16 driving ATVs; personal experience is likely to discredit the warning. It is likely that many consumers regularly carry children as passengers without incident, therefore they are more likely to believe that carrying passengers is safe since the ATV seat appears to be designed for it and they have done so safely in the past.

Family sport and passengers

According to comments #1 and 44, ATV driving is considered by many to be a family sport. Children that are too young to drive their own ATV may be placed in front of or behind their parents on the large seat as a method to allow the whole family to ride together. If the family has more members than ATVs, several children may ride together on one ATV. The high cost of ATVs may contribute to families owning less than one ATV per person, as not every family will be able to afford an ATV for every member who wishes to ride. This could also contribute to children riding the wrong machine. For example a family may only purchase one ATV and a parent might allow the child to ride the family ATV.

VI. Summary

Since the petition proposes a ban on the sale of adult ATVs for use by children under the age of 16, it is a partial ban. A partial ban may raise awareness that adult ATVs are inappropriate for some children, but as evidenced in many comments, some parents may ignore such warnings. Additional safety and warning messages are not likely to be effective in deterring child use of ATVs, since many have seen other children riding without incident. Finally, it will be difficult to discourage parents carrying children as passengers due to the large seat and their desire to be with their small children who are too young to drive on their own. Therefore, it is difficult to determine if this partial ban would have any significant effect on the number of children riding adult ATVs.

⁹ Comments 7, 11, 17, 18, 20, 27, 50, and 51 to Federal Register notice Vol. 67, Number 202, p.64353-64354

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Memorandum

Date:

April 1, 2004

TO

Elizabeth Leland, Project Manager

THROUGH:

Sue Ahmed, Ph.D., Associate Executive Director

Directorate for Epidemiology

Russ Roegner, Ph.D., Director

RR

Hazard Analysis Division

FROM

Robin L. Ingle, Mathematical Statistician RM

Hazard Analysis Division

SUBJECT:

Risk of ATV Riding Compared to Other Activities and Staff Response to

Comment #71 on CPSC Petition 02-4/HP 02-1

Several of the public comments on CPSC Petition 02-4/HP 02-1 mentioned or requested information on injury and hospitalization rates associated with ATVs compared to injury and hospitalization rates for other activities. The purpose of this memo is to address these issues, as well as other issues raised by one commenter.

Staff analyzed data from the National Electronic Injury Surveillance System (NEISS) for 2001 to determine the numbers of injuries, the rates of injury and the rates of hospitalization for ATV-related injuries and injuries associated with other activities. NEISS assigns a product code to each injury case occurring in an activity that is likely to involve a consumer product. It also allows for the coding of several levels of disposition, including hospitalized, treated and transferred, held for observation, and dead on arrival. For purposes of this memo, all of these were included in the hospitalization rate, since the intent is to offer an ad-hoc comparison of injury severities.

Table 1 on the next page presents the hospitalization rates for participants seven years of age or older. Only this age group was considered because of lack of participation data for younger children. Methodological issues are presented at the end of this memorandum.

Staff also analyzed injury and participation data from various activities to determine the risk of injury and the risk of hospitalization for the activities. Participation data for 2001 from the National Sporting Goods Association was used for all activities except ATV riding. This data is limited to participants seven years of age or older, and so this analysis is also limited to the same age group. For ATV riding, exposure estimates were generated from CPSC's 2001 Injury and Exposure Studies (see also Levenson, M.S. "ATV Risk Estimates for Youth", memorandum, March 24, 2004; and Ingle, R.L., 2002 "Annual Report of ATV Injuries and Deaths",

memorandum, September 15, 2003). Table 2 presents the estimated risks of the activities. Methodological issues are discussed at the end of this report.

Table 1: Estimated Injuries, Hospitalized Injuries and Hospitalization Rates Associated

with All-Terrain Vehicles and Other Activities, Ages Seven and Older, 2001

With All- Lett day 1 con-	cies and Other Activities	Estimated	Estimated Hospitalization Rate
A _4**A	Estimated Injuries	Hospitalizations	(Percent)
Activity Snowmobiling	14,958	1,842	12.31%
	105,504	12,810	12.14
ATV Riding	18,682	1,144	6.12
Paintball Games	40,244	2,021	5.02
Golf Distinct	468,078	21,613	4.62
Bicycle Riding		2,267	3.53
Snowboarding	64,190	704	2.89
Tennis	24,343	2,069	2.74
Inline Skating	75,469		2.73
Scooter Riding	77,886	2,123	2.63
Skateboarding	101,044	2,656	1.64
Roller Skating (2x2)	52,133	857	
Wrestling	52,296	827	1.58
Football	410,232	6,481	1.58
Baseball	161,768	2,316	1.43
Soccer	172,199	2,242	1.30
Swimming	67,895	777	1.14
Softball	126,299	1,382	1.09
Basketball	646,905	5,476	0.59
Archery	3,938	*	*
Badminton	1,432	*	*
Billiards/Pool	5,137	*	*
Bowling	20,212	*	*
Boxing	11,261	*	*
Cheerleading	24,646	*	*
Darts Throwing	750	*	*
Fishing	74,432	*	*
Horseshoe Pitching	2,252	*	*
Ice Skating	24,836	*	*
Martial Arts	23,248	*	*
Mountain Biking	19,167	*	*
Table Tennis	1,328	*	*
Volleyball	57,895	*	*
Waterskiing	10,978	*	*

^{*}These estimates are not presented because not enough cases were identified in NEISS to result in a reliable estimate, i.e. the coefficient of variation is considered too large.

Source: National Electronic Injury Surveillance System, Directorate for Epidemiology, U.S. Consumer Product Safety Commission.

Table 2: Risk of Injury and Risk of Hospitalization Associated With All-Terrain Vehicle

Riding and Other Activities, Ages Seven and Older, 2001

Riding and Other Act	ivides, Ages Seve	and Older, 200	Estimated	Estimated Risk of
		Estimated	Risk of Injury	Hospitalization
	Estimated	Participants	Per Thousand	Per Thousand
Activity	Injuries	(thousands)	Participants	Participants
ATV Riding	105,504	20,326	5.19	0.63
Football	410,232	16,502	24.86	0.39
Snowmobiling	14,958	5,541	2.70	0.33
Bicycle Riding	468,078	70,418	6.65	0.31
Snowboarding	64,190	7,662	8.38	0.30
Skateboarding	101,044	10,397	9.72	0.26
Wrestling	52,296	3,769	13.88	0.22
Basketball	646,905	29,153	22.19	0.19
Scooter Riding	77,886	13,318	5.85	0.16
Paintball Games	18,682	7,460	2.50	0.15
Soccer	172,199	14,662	11.74	0.15
Baseball	161,768	15,802	10.24	0.15
Inline Skating	75,469	20,673	3.65	0.10
Softball	126,299	14,184	8.90	0.10
Roller Skating (2x2)	52,133	9,700	5.37	0.09
Golf	40,244	29,540	1.36	0.07
Tennis	24,343	11,943	2.04	0.06
Swimming	67,895	94,052	0.72	0.01
Archery	3,938	5,314	0.74	*
Badminton	1,432	5,996	0.24	*
Billiards/Pool	5,137	36,312	0.14	*
Bowling	20,212	49,592	0.41	*
Boxing	11,261	2,069	5.44	*
Cheerleading	24,646	4,037	6.11	*
Darts Throwing	750	18,811	0.04	*
Fishing	74,432	48,726	1.53	*
Horseshoe Pitching	2,252	11,730	0.19	*
Ice Skating	24,836	8,777	2.83	*
Martial Arts	23,248	5,455	4.26	*
Mountain Biking	19,167	18,130	1.06	*
Table Tennis	1,328	9,960	0.13	*
Volleyball	57,895	13,902	4.16	*
Waterskiing	10,978	6,599	1.66	*

^{*}These estimates are not presented because not enough cases were identified in NEISS to result in a reliable estimate, i.e. the coefficient of variation is considered too large.

Sources: Directorate for Epidemiology, U.S. Consumer Product Safety Commission; National Sporting Goods Association.

It is interesting to note that while the risk of injury to participants in many sports substantially exceeds the risk of injury to ATV riders, the risk of serious injury (in the form of

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hospitalizations) to ATV riders is 61 percent higher than the next highest risk of hospitalization in Table 2. This suggests that injuries to ATV riders, as a group, may be more serious than injuries to participants in the other activities listed.

The high rate of injury to football participants compared to the risk of hospitalization may be explained by the fact that football is often played in official games where injured participants might be more encouraged or required to seek emergency room treatment for less serious injuries than might be the case in non-official activities. The same could be said of basketball, hockey, wrestling, soccer and baseball.

Other Comments

In response to a Federal Register notice about the petition, the Commission received a comment that made several additional points that require a response (comment #71). These points are enumerated below, along with the staff response:

1. Comment: CPSC's All-Terrain Vehicle 2001 Injury and Exposure Studies show that "a large portion of the increase in the estimated number of ATV-related injuries since 1997 is due to increased exposure in the form of higher numbers of ATVs, ATV riders and ATV riding hours" (Levenson, 2003).

Staff response: From 1997 to 2001, the number of ATVs in use increased an estimated 40 percent; the number of ATV riders increased an estimated 26 percent; and the number of ATV riding hours increased an estimated 45 percent (Levenson, 2003). In the same period, injuries increased 109 percent, from an estimated 52,800 to an estimated 110,100 (Ingle 2003). The increase in injuries is not completely accounted for by the increase in the numbers of ATV drivers, driving hours, riders, riding hours or ATVs in use.

2. Comment: The risk of injury associated with ATVs is "well below pre-consent decree levels."

Staff response: Staff does not disagree that the risk of injury associated with ATVs in the period 1999 to 2002 (which ranged from 184.7 to 200.9 injuries per 10,000 four-wheel ATVs) is below the risk in the period 1985-1987 (which ranged from 305.9 to 319.2 injuries per 10,000 four-wheel ATVs) (Levenson, 2004). However, risk of injury is not the only factor in determining overall risk. The risk of death associated with four-wheel ATVs in the post-decree years (which ranged from 1.2 to 1.4 deaths per 10,000 four-wheel ATVs) is comparable to the risk in the predecree years (which ranged from 1.1 to 1.5 deaths per 10,000 four-wheel ATVs). These statistics are presented in CPSC's 2002 Annual Report of ATV Deaths and Injuries (Ingle, 2003).

Likewise, the hospitalization rate should be considered in evaluating the overall risk associated with ATVs. The hospitalization rate for injuries associated with ATVs was 12 percent in 2001 – as shown in Table 1 – which is substantially higher than every other activity mentioned in the commenter's submission. This may indicate that injuries associated with ATVs are more serious than injuries associated with activities that exhibit a lower hospitalization rate.

3. Comment: ATVs are safer than motor vehicles from both an injury perspective and a fatality perspective.

Staff response: Staff agrees that the fatality rates for motorcycles, passenger cars and light trucks are higher than the fatality rate for ATVs, but disagrees that the injury rates for those motor vehicles are higher than for ATVs. Presented below are the injury and fatality rates using the latest available data from the National Highway Traffic Safety Administration (for motorcycles, light trucks and passenger cars) and CPSC (for ATVs). It should be noted that the definition of an injury may differ between the two agencies; CPSC's data includes injuries presenting to a hospital emergency room, while NHTSA's definition includes injuries that were reported to police. CPSC data does not include cases that may have been reported to police but in which the injured party did not go to a hospital emergency room; likewise, NHTSA's data does not include injuries that may have presented to an emergency room but were never mentioned to law enforcement. Consequently, Table 3 should be interpreted with caution.

Table 3: Fatality Rates and Injury Rates for Motorcycles, Passenger Cars, Light Trucks

and Four-Wheel ATVs, 2001.

Vehicle Type	Fatality Rate Per 100,000 Vehicles	Injury Rate Per 100,000 Vehicles
Motorcycles 1	65.20	1,229
Passenger Cars ²	15.79	1,497
Light Trucks ³	14.84	1,089
Four Wheel ATVs ⁴	11.95	2,009

4. Comment: The ATV fatality risk is comparable to the fatality risk associated with bicycling and swimming.

Staff response: Staff disagrees with the calculation of the ATV fatality risks presented by the commenter in Exhibits 9 and 10 of the comment. Using the estimated number of deaths associated with all ATVs in 2001 from CPSC's Annual Report along with the estimated number of ATV riders in 2001 from CPSC's 2001 Injury and Exposure Studies, the death rate for ATVs in 2001 is 634 deaths over 22.9 million riders, equaling a death rate of 2.8 fatalities per 100,000 participants. This appears to be greater than the commenter's values of 2.4 fatalities per 100,000 participants for bicycling and 2.2 fatalities per 100,000 participants for swimming.

¹ Traffic Safety Facts 2002. U.S. National Highway Traffic Safety Administration. January 2004. Table 10.

² Traffic Safety Facts 2002. U.S. National Highway Traffic Safety Administration. January 2004. Table 7.

³ Traffic Safety Facts 2002. U.S. National Highway Traffic Safety Administration. January 2004. Table 8.

⁴ Ingle, R.L., "2002 Annual Report of ATV Deaths and Injuries", memorandum. Sept. 15, 2003. U.S. Consumer Product Safety Commission.; and Levenson, M.S., "2001 Operability Rate Analysis", memorandum. May 6, 2003. U.S. Consumer Product Safety Commission.

5. Comment: "If children were to shift from riding ATVs to other recreational activities which have similar or greater risk of injury, it would not appear to reduce overall injuries."

Staff response: Staff does not disagree with this assertion. However, it isn't clear that if the petitioner's request was granted that children would shift to activities having similar or greater risk than ATV riding. In fact, while some children may seek out a replacement activity of a dangerous nature, given the wide availability of safer alternatives (as exhibited in Tables 1 and 2 of this memo) it is likely that some portion of those who are denied the opportunity to ride ATVs would choose a replacement activity with a lesser risk of injury and death.

6. Comment: Warned-against behavior is a key factor in most ATV-related fatalities.

Staff response: Staff does not disagree with this assertion. This issue is further examined at Tab F of this briefing package (Ingle, 2004).

7. Comment: ATVs with engine sizes of 400 cc or larger do not pose disproportionate risks.

Staff response: Staff not only disagrees with this assertion, but also disagrees that it is relevant to the petitioner's request for a ban on the sale of ATVs with engines greater than 90 cc for use by children.

However, the issue of ATV engine size and the risks posed to children under 16 is relevant. CPSC's 1997 injury and exposure study and subsequent analyses showed a significant positive correlation between engine size and risk of injury exists (Rodgers and Adler, 2001). For example, the risk of injury for a child on a 200 cc ATV is 1.9 times the risk of injury on an 80 cc ATV, and the risk on a 400 cc ATV is more than four times the risk on an 80 cc model.

Methodology

The data sources used in this analysis are CPSC's National Electronic Injury Surveillance System (NEISS); the National Sporting Goods Association's (NSGA) Sports Participation in 2001 (NSGA 2002a and 2002b); and CPSC's All-Terrain Vehicle 2001 Injury and Exposure Studies (Levenson, 2003a).

NEISS is a probability sample of 98 U.S. hospitals with 24-hour emergency rooms (ERs) and more than six beds. NEISS collects data from these hospitals on all consumer product-related injuries presenting in the hospitals' ERs, as well as injuries associated with some common activities that are likely to involve a consumer product (Kessler and Schroeder, 1999).

NSGA's Sports Participation in 2001 is an analysis of responses to a mail survey from a statistical sample of households in the continental United States. NSGA's sample included 20,000 households, pre-selected from a mail panel resource of more than 300,000 households balanced on key indicators of purchase behavior. The questionnaire asked household members who were at least seven years of age about the sports they participated in in 2001 and how often that participation occurred. The response rate was 67.7 percent. In the analysis of the responses, NSGA defined "participation" as participating more than once a year in most sports included in this memo. Exceptions included bicycle riding and swimming, for which participation was defined as engaging in the activity six or more times in 2001.

The NSGA analysis did not include ATV riding as one of the activities in its study. Because of this, ATV participation estimates were generated from CPSC's All-Terrain Vehicle 2001 Injury and Exposure Studies. For purposes of this memo, participation in ATV riding was defined as riding a three- or four-wheeled ATV as a driver or passenger at least once during the year. Only participants aged seven or older were included, so the exposure estimates presented here differ slightly from those presented in the report on the injury and exposure studies.

Because CPSC's All-Terrain Vehicle 2001 Injury and Exposure Studies defined participation in ATV riding as engaging in the activity one or more times in the year, some modifications were made to NSGA's estimates in the interest of comparability. To obtain comparable NSGA estimates, the number of multi-day participants (i.e. those defined by NSGA as technical participants) for each sport was added to the number of single-day participants (i.e. those defined by NSGA as non-participants). For bicycle riding and swimming, the total estimate was the sum of the estimates for the number of people who rode or swam six or more times in 2001 plus the number of people who rode or swam between one and five days, inclusive.

In addition, some of the sport groupings obtained from NSGA differed from those available through NEISS. For instance, the category football, defined by a single product code in NEISS, is split into touch football and tackle football in the NSGA analysis. While NEISS can generate a single estimate for the number of injuries associated with football, NSGA provides two estimates for football participants (who played more than once a year) plus two estimates for the number of people who participated in football only once during the year. The two categories (touch football and tackle football) are not mutually exclusive in the NSGA data; a respondent who answered yes to a question about whether s/he played touch football during 2001 may also have answered

yes to a question about whether s/he played tackle football during 2001. Taking an additive approach to computing an estimate for the total number of football participants would lead to double counting of these individuals. Because of this, the estimate for the number of multi-day football participants was obtained by adding the estimate for touch football multi-day participants to the estimate for tackle football multi-day participants and then subtracting the estimate for the number of people who responded affirmatively to both activities. Estimates for the overlap among single-day participants were not available, so this approach was not utilized for that group. The small numbers of respondents who participated in both activities only once during the year are thus double counted, but the effect is expected to be small. This approach was utilized for the categories of fishing and mountain biking as well. In the NSGA data, fishing is subdivided into fresh-water fishing and salt-water fishing. Mountain biking is broken down into off-road mountain biking and on-road mountain biking.

NEISS provided estimates for the number of ER-treated injuries in 2001 associated with the various activities. NEISS includes a disposition code that allows a breakdown of the estimate according to whether the victim was treated and released, hospitalized, held for observation, transferred to another hospital, or was dead on arrival. While the total injury estimates presented in this memo include all injuries regardless of disposition, the estimates for hospitalized injuries include only injuries to victims who were hospitalized, held for observation, transferred to another hospital or were dead on arrival. Although technically DOA victims are not "hospitalized", these are included in the hospitalization estimate because the intent is to provide a measure of how many victims were "hospitalized or worse". It should be noted that in some activities (notably ATV riding), many fatalities never make it to an emergency room and so are never counted in NEISS, and so the hospitalization-or-worse rates presented here may be slight underestimates.

The three skating categories presented here (inline skating; roller skating; and ice/figure skating) are each a combination of the given category and a portion of the skating injuries coded under skating, not otherwise specified. The skating, not otherwise specified cases constitute a small portion of the total skating injuries. In order to allow for comparability with the NSGA data (which does not include an unknown category for skating), the injuries coded under skating, not otherwise specified were apportioned among the three specified categories according to the distribution of the known injuries among the three specified categories.

Activities were evaluated for inclusion in this memo on the basis of whether comparable estimates could be obtained from both NEISS and the NSGA data. There are more activities included in NEISS than are presented here, because participation estimates for some NEISS categories were not available from NSGA. NSGA data does include a few activities that NEISS doesn't, or that NEISS includes in different forms, and so those activities also are not presented here. Some activities were excluded because the coefficients of variation of the estimated numbers of injuries were considered too large. These activities were fencing, scuba diving, shuffleboard, and snow skiing.

The estimated hospitalization rate was calculated by dividing the estimated number of "hospitalized or worse" injuries by the estimated number of injuries. The estimated risk of injury is the estimated number of injuries divided by the total number of participants in each activity.

The estimated risk of hospitalization is the estimated number of "hospitalized or worse" injuries divided by the total number of participants in each activity.

The estimated number of injuries and the estimated number of hospitalizations associated with ATVs come from NEISS and CPSC's All-Terrain Vehicle 2001 Injury and Exposure Studies, and both are adjusted according to the methodology described in CPSC's 2002 Annual Report of ATV Deaths and Injuries (Ingle, 2003). The estimated risk of injury associated with ATVs presented in the annual report differs from that presented here because this memo uses participants as the denominator of the ratio, while the annual report uses the number of ATVs in use.

References

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- U.S. National Highway Traffic Safety Administration. (2004). Traffic safety facts 2002.

T A B

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United States CONSUMER PRODUCT SAFETY COMMISSION Washington, D.C. 20207

MEMORANDUM

DATE: March 18, 2003

Elizabeth Leland, EC TO

Todd A. Stevenson, Secr Through:

Martha A. Kosh, OS FROM

SUBJECT: Petition Requesting Ban of All-Terrain Vehicles

Sold for Use by Children 16 Years Old

ATTACHED ARE COMMENTS ON THE _ CA 03-1

COMMENT	DATE	SIGNED BY	<u>AFFILIATION</u>
CA 03-1-1	10/24/02	Bev Stubbs	6505 Fruiland RDNE Salem, OR 97301
CA 03-1-2	11/06/02	Vernon Tolo President	American Association of Orthopaedic Surgeons 6300 North River Rd. Rosemont, IL 60018
CA 03-1-3	11/07/02	Jeffrey Briton MD, FAAP	American Academy of Pediatrics 2414 Kohler Memorial Dr. Sheboygan, WI 53081
CA 03-1-4	11/08/02	Donna Nowakowski Exec. Director	Emergency Nurses Assoc. 915 Lee Street Des Plaines, IL 60016
CA 03-1-5	11/08/02	Consumers Appx 1,500	Consumers
CA 03-1-6	11/12/02	Heather Paul Exec. Director	National Safe Kids Campaign 1301 Pennsylvania Ave, NW, Suite 1000 Washington, DC 20004
CA 03-1-7	11/22/02	Michael Martin	2344 Reflections Dr. Aurora, IL 60504

CA	03-1-8	11/22/02	Gary Smith MD, FAAP, FACPM Director	Children's Center for Injury Research and Policy Children's Hospital 700 Children's Dr. Columbus, OH 43205
CA	03-1-9	11/25/02	Cathy Ellis Coordinator	Wilkes County Safe Kids Child Abuse Prevention Team 203 East Main St. Wilkesboro, NC 28697
CA	03-1-10	12/03/02	Donna Joyner BSN, Coordinator	Forsyth County Safe Kids Wake Forest Univ. School Of Medicine at the Bowman Gray Campus & the NC Baptist Hospitals, Incorporated Medical Center Boulevard Winston-Salem, NC 27157
CA	03-1-11	12/06/02	Doug Farnen	RR 4, Box 35 Salisbury, MO 65281
CA	03-1-12	12/07/02	Maya Fischhoff	1116 Nielsen Ct, #3 Ann Arbor, MI 48105
CA	03-1-13	12/07/02	Robert DiTusa	Rt 6, Box 22H Blanchard, OK 73010
CA	03-1-14	12/07/02	Margaret Mitchell	2009 North Broad St. Galesburg, IL 61401
CA	03-1-15	12/07/02	Nancy Oliver	427 S Westminster Ave Apt. 113 Los Angeles, CA 90020
CA	03-1-16	12/07/02	David Veenstra	1800 Rossman, SE Grand Rapids, MI 49507
CA	03-1-17	12/07/02	Karyn LeMay	8395 Cypress Ct Dublin, CA 94568
CA	03-1-18	12/07/02	Jonathan Perkins	2417 Mathews Ave, #C Redondo Beach, CA 90278
CA	03-1-19	12/08/02	K. Armstrong	6321 N Winthrop Ave Apt. 206 Chicago, IL 60660
CA	03-1-20	12/08/02	Jessica Price	13902 Tangle Tree San Antonio, TX 78247

CA 03-1-21	12/09/02	Scott Atchison	7718 Stony River Ct Bakersfield, CA 93308
CA 03-1-22	12/06/02	M. Tillirson D.O. Emergency Dept. Medical Director	Anderson Area Medical Center 800 North Fant St. Anderson, SC 29621
CA 03-1-23	12/10/02	Public Interest Groups (20)	Alabama Watch The Baily Building 400 S Union St, Ste 245 Montgomery, AL 36104
CA 03-1-24	12/11/02	E Stephen Edwards MD, President	American Academy of Pediatrics The Homer Building 601 thirteenth St, NW Suite 400 North Washington, DC 20005
CA 03-1-25	12/12/02	Janet Paquette MD, FACEP OCEP, President	The Oregon Chapter of the American College of Emergency Physicians
CA 03-1-26	12/12/02	Nancy Cowles Exec. Director	Kids In Danger 116 W. Illinois Street Suite 5E Chicago, IL 60610
CA 03-1-27	12/12/02	Royce Wood (AMA) Doug Morris (ATV Assoc)	American Motorcyclist Association 13515 Yarmouth Dr. Pickerington, OH 43147
CA 03-1-28	12/12/02	Rachel Weintraub Assistant General Counsel	Consumer Federation of America 1424 16 th St, NW Suite 604 Washington, DC 20036
CA 03-1-28a	3/14/03	Rachel Weintraub	Address same as above
CA 03-1-29	12/13/02	E. Mierzwinski Consumer Program Director	US Public Interest Research Group 218 D Street, SE Washington, DC 20003
CA 03-1-30 Ltr dated		Dwyane Smith Coordinator	Anderson County Safe Kids Coalition Anderson Area Medical Center, Emergency Ctr. 800 North Fant St. Anderson, SC 29621

CA 03-1-31 Ltr dated		Peter Zadis	115-64 20 St. Jamaica, NY 11411
CA 03-1-32 Ltr dated		Michael Baringer Judy Hawkins	Cleveland County Safe Kids Coalition 201 East Grover St. Shelby, NC 28150
CA 03-1-33 Ltr dated		Helen Magnavita Consumer	656 W. Washington, St Slatington, PA 18010
CA 03-1-34 Ltr dated		Burnis E. Tuck Consumer	8852 N. Chance Ave. Fresno, CA 93720
CA 03-1-35 Ltr dated		Roger Hoover Chair	Child Fatality Review Board od the County of Summit 264 South Arling St. Akron, OH 44306
CA 03-1-36 Ltr dated	12/13/02 12/10/02	William Walton	1970 Stockslager Rd. Oakland, MD 21550
CA 03-1-37 Ltr dated		Tom Rabe	P.O. Box 619 Turner, OR 97392
CA 03-1-38	12/13/02	Wilderness Society Organizat:	ions
CA 03-1-39 Dated	12/16/02 12/09/02	Barbara Lee, PhD Director Michael Peters Rural Youth Safety Specialist	National Farm Medicine Center 1000 North Oak Ave. Marshfield, WI 54449
CA 03-1-40 Dated		Laura DeGolier	114 S. Main St. PMB 301 Fond Du Lac, WI 54935
CA 03-1-41 Dated	12/17/02 12/07/02	David Lien	430 E. Cheyenne Mt Blvd #21 Colorado Springs, CO 80906
CA 03-1-42	12/17/02	R. Thunderchild	53 Radiker Rd. Worthington, MA 01098
CA 03-1-43 Dated		Susan Rzucidlo MSN, RN	Dauphin County Safe Kids Coalition Milton S Hershey Center Pediatric Surgery, H113 P.O. Box 850 Hershey, PA 17033

	12/20/02 1 12/08/02	Bonnie Hiniker	1286 Shadywood Shores Dr N.W., Pine River, MN 56474
CA 03-1-45	12/23/02	Gary Olsen	5578 Dumore Dr, SE Aumsville, OR 97325
CA 03-1-46	12/23/02	Jess Stolp	235 S.W. Braly St. McMinnville, OR 97128
CA 03-1-47	12/24/02	R. Morgenthaler	906 Mtn Hm Lane Gamano Island, WA 98282
CA 03-1-48	12/23/02	R. David Pittle Sr Vice President Sally Greenberg Sr Product Safety Counsel	Consumers Union 1666 Connecticut Ave NW, Suite 310 Washington, DC 20009
CA 03-1-49 Ltr dated		Christine Hanshaw RN, BSN, Project Director	Baren River District Health Department 1109 State St. P.O. Box 1157 Bowling Green, KY 42102
CA 03-1-50 Ltr dated		Jim Keating Chair	Kansas Safe Kids Coalition 1000 SW Jackson St Suite 230 Topeka, KS 66612
CA 03-1-51	12/27/02	Peter Di Primo	Peter Di Primo Simi Valley, CA 93065
CA 03-1-52 Ltr dated		W.S. Woodland	2760 East Sun vista Cir. Clinton, WA 98236
CA 03-1-53 Ltr dated		Ian Thomas	104 Valley View Rd. Media, PA 19063
CA 03-1-54	01/01/03	Michelle Brown Community Relations Specialist	The Greater Dayton Area Safe Kids Coalition c/o The Children's Medical Center One Children's Plaza Dayton, OH 45404
CA 03-1-55	C	eri Essen oalition oordinator	Summit County National Safe Kids Campaign 6505 North Landmark Dr. #300 Park City, UT 84098

CA 03-1-56 Ltr dated		Kerry Chausmer Exec. Director	Louisiana Safe Kids, Inc 325 Loyola Ave, #305 New Orleans, LA 70112
CA 03-1-57 Ltr dated		Linda Hughes Coalition Coordinator	Robeson County Safe Kids Coalition, Lead Agency 460 Country Club road Lumberton, NC 28360
CA 03-1-58	1/30/03	Jonathan Groner MD, Trauma Medical Director	Children's Hospital Room Ed-341 700 Children's Drive Columbus, OH 43205
CA 03-1-59	2/06/03	Roy Sterner Public Health Administrator Team Coordinator	Allegheny County Health Department Maternal & Child Health Program 907 West St, 2 nd Floor Pittsburgh, PA 15221
CA 03-1-60	2/11/03	Jane Garrison Coordinator	Safe Kids of Savannah Coalition P.O. Box 14257 Savannah, GA 31416
CA 03-1-61	2/12/03	Kenneth Gilmour	195 Simcoe Street Suite Three Peterborough, Ontario K9H2H6 CANADA
CA 03-1-62	2/19/03	Karen Feury, RN APN, BC	Northern New Jersey Safe Kids Campaign Moristown Memorial Hospital 100 Madison Ave. Morristown, NJ 07960
CA 03-1-63	2/21/03	Anne Franchak Director	Pennsylvania Safe Kids Coalition 1300 Market St., Suite 12 Lemoyne, PA 17043
CA 03-1-64 Rec'd 3/3	2/18/03	R. Peter Altman M.D.	American Pediatric Surgical Association 60 Revere Dr., Suite 500 Northbrook, IL 60062
CA 03-1-65	3/03/03	Ray Mays Vice President of Health Safety & Environmental	Veritas DGC Land 10300 Town Park Houston, TX 77072

CA 03-1-66	3/03/03	Lisa Blystra R.N., Program Manager	Lakeshore Safe Kids Coalition 665 136 th Ave. Holland, MI 49424
CA 03-1-67	3/14/03	The Wilderness Society Organizations	Scott Kovarovics 1615 M Street, NW Washington, DC 20036
CA 03-1-68	3/14/03	Cheryl Hystad Exec. Director	Maryland Consumer Rights Coalition, Inc. 512 Murdock Road Baltimore, MD 21212
CA 03-1-69	3/15/03	Students	Florida International University, College of Business Administration Room 140, University Park Miami, FL 33199
CA 03-1-70	3/15/03	John Hafner, Jr. MD, FACEF	University of Illinois College of Medicine at Peoria, Division of Medicine
CA 03-1-71	3/17/03	Ann Staron Legal Assistant	Willkie Farr & Gallagher 1875 K St, NW Washington, DC 20006
			Joint Comments of America Honda Motor Co., Inc. American Suzuki Motor Corp. Arctic Cat Inc., Bombardier Motor Corporation Of America, Kawasaki Motors Corp, USA Polaris Industries Inc. and Yamaha Motor Corp., USA
CA03-1-72 Rec'd 3/19	3/7/03	Ray Fritz Clara Fritz	5643 Cora Way Taylorsville, UT 84118
CA03-1-73 Rec'd 3/19	3/11/03	Brian Baker Co-Coordinator	Lincoln-Lancaster County Safe Kids Coalition 3140 N Street Lincoln, NE 68510

CA03-1-74 Rec'd 3/19	3/11/03	Betty Johnsey M.A.Ed., Injury Prevention Educator	Lenoir County Safe Kids P.O. Box 1678 Kinston, NC 28503
CA03-1-75	3/12/03	Jim Long Chair	North Carolina Safe Depart. Of Insurance P.O. Box 26387 Raleigh, NC 27611
CA03-1-76	3/17/03	G. Zuckerman MA, CHES	New Hanover County Safe Kids Coalition 2029 South 17 th St Wilmington, NC 28401
CA03-1-77 Rec'd 3/26	3/14/03	Sylvia Scholl WakeMed Trauma Manager	Wake County Safe Kids Coalition MEI Suite 304 300 New Bern Avenue Raleigh,NC 27610
CA03-1-78	3/15/03	Roxanne Hoffman M.Ed, Coordinator	San Diego Safe Kids Coalition 3020 Children's Way MC 5073 San Diego, CA 92123

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CPSC ATV Field Hearing June 5, 2003 Morgantown, West Virginia Presenters

Rachael Weintraub -- Consumer Federation of America, Washington, DC

Senator Michael A. Oliverio, II -- Morgantown, WV

Edward J. Heiden -- Heiden Associates, Inc., Washington, DC

Jim Helmkamp, Ph.D. -- West Virginia University, Morgantown, WV

Sally Greenberg -- Consumers Union, Washington, DC

Deborah L. Napier, Esq. -- Middleburg, VA

Sam Leeson -- Bridgeport, WV

Roger F. Haggie -- Specialty Vehicle Institute of America, Irvine, CA

Jeff DeVol -- DeVol's Cycle Center, Parkersburg, WV

Gene Smithson -- Summersville Cycles, Summersville, WV

Elizabeth Piper -- Specialty Vehicle Institute of America, Irvine, CA

Tom Yager-- Specialty Vehicle Institute of America, Irvine, CA

Jim Brenner -- Rocket Pack/Veritas DGC, Hampton, NH

Buck Warfield -- ATV Safety Institute, Sykesville, MD

Lester Horst -- Horst Cycle, Inc., Greencastle, PA

Dick Lepley -- PA Motorcycle Dealers Association, NOHVCC, Conneaut Lake, PA

Leff Moore -- WV Recreational Vehicle Association, WV ATV Safety Coalition

Royce L. Wood -- American Motorcyclist Association, Pickerington, OH

Doug Morris -- All-Terrain Vehicle Association, Pickerington, OH

Michael Babusci -- PA OHVA, New Kensington, PA

Dr. Nimish Mehta -- Charleston, WV

Dr, Jonathan Groner -- Columbus, OH

Dr. Rebeccah Brown -- Cincinnati, OH

Dr. Jeffrey S. Upperman -- Pittsburgh, PA

Dr. Ann Carr -- Morgantown, WV

Dr. Jack Bergstein - Morgantown, WV

Dr. Joan Phillips -- Scott Depot, WV

Dr. Bonnie Beaver -- Huntington, WV

Matthew Ballard -- Hatfield McCoy Trails, Lynburn, WV

Russ Ehnes -- NOVHCC, Great Falls, MT

Scott Kovarovics -- Natural Trails and Waters Coalition, Washington, DC

Bill Dart -- Blue Ribbon Coalition, Pocatello, ID

Jennifer Martin -- Hilton Head Island, SC

Lt. C.W. Schollar -- WV Division of Natural Resources, Beckley, WV

Susan Halbert -- National 4-H Council, Chevy Chase, MD

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United States CONSUMER PRODUCT SAFETY COMMISSION Washington, D.C. 20207

MEMORANDUM

DATE: July 8, 2003

TO : Elizabeth Leland, EC

Through: Todd A. Stevenson, Secretary, 6

FROM : Martha A. Kosh, OS

SUBJECT: Public Field Hearing Concerning All-Terrain Vehicles

ATTACHED ARE COMMENTS ON THE ___CA 03-1a

-			
COMMENT	DATE	SIGNED BY	AFFILIATION
CA 03-1a-1	4/23/03	B. Sachau	15 Elm Street Florham Park, NJ 07932
CA 03-1a-2	4/24/03	Rob Zimmerman	Rob Zimmerman
CA 03-1a-3	4/24/03	Alex Ernst Communications Director	NYSOVA Inc. P.O. Box 250 Clarksville, NY 12041
CA 03-1a-4	4/24/03	Sharon Arnold	Grassy Meadows, WV
CA 03-1a-5	4/24/03	Ronald D. Courts Environmental Services Officer	City of Roswell
CA 03-1a-6	4/26/03	Gloria & Pat	gloriag@ntcnet.com
CA 03-1a-7	4/27/03	Rich Piazza	cbr6speed@yahoo.com
CA 03-1a-8	4/27/03	Thomas Murden	498 Jenny Brook Road Napanoch, NY 12458
CA 03-1a-9	4/27/03	Ron Ford	ford@charter.net
CA 03-1a-10	4/29/03	Joseph Bellinger	racers@twcny.rr.com
CA 03-1a-11	4/30/03	Carl Holttum	Carl Holttum
CA 03-1a-12	5/01/03	Robert Bolte	bolte@med.utah.edu
CA 03-1a-13	5/01/03	Nathan Clark	Nathan Clark

CA 03-1a-14	5/05/03	Mike Adams	Fwcoinc@aol.com
CA 03-1a-15	5/06/03	Paul Nusbaum Secretary	Department of Health And Human Resources State Capitol Complex, Building 3, Room 206 Charleston, WVA 25305
CA 03-1a-16	5/07/03	Rod Slings Recreation Safety Programs Supervisor	Department of Natural Resources Wallace State Office Building 502 East 9 th Street Des Moines, IA 50319
CA 03-1a-17	5/12/03	John Merritt Exec. Director	WorkSafe Victoria Victorian Workcover Authority GPO Box 4306, Melbourne 3001
CA 03-1a-18	5/16/03	Ryan Devries	Consumer
CA 03-1a-19	5/17/03	Rhonda Treadaway	Consumer
CA 03-1a-20	5/17/03	Phil Smith	Consumer
CA 03-1a-21	5/19/03	Martin Blair	Consumer
CA 03-1a-22	5/19/03	R. Otterstedt Chairman	Pine Barrens Law Enforcement Council P.O. Box 587 3525 Sunrise Highway 2 nd Floor Great River, NY 11739
CA 03-1a-23	5/23/03	William Walton	Consumer
CA 03-1a-24	5/23/03	Larry Partridge	Consumer
CA 03-1a-25	5/26/03	Jethro Moyer qu	uadracer5487@hotmail.com
CA 03-1a-26	5/27/03	Jeremy McCord	209 East Chestnut St. Puryear, TN 38251
CA 03-1a-27	5/27/03	Glenda Gallimore Kenny Gallimore	Box 173 Hazel, KY 42049
CA 03-1a-28	5/28/03	Matt Peltzer	11101 SW Highway 59 Rushville, MO 64484
CA 03-1a-29	5/28/03	James Chiga	jchiga@goteam.ws

ı	Pul	olic	Field	Hearing	Con	cern	ing A	ll-Ter	rain Vehicles
	CA	03-3	la-30	5/29/03	R	ober	t Bir	kinsha	w 5762 River Park Drive Murray, UT 84123
	CA	03-1	la-31	5/30/03	M	ike 1	3lume	:	Lebanon Fire Department Lebfire@in-motion-net
	CA	03-1	la-32	5/31/03	М	ark 1	erra	n ·	mferran@nycap.rr.com
	CA	03-3	la-33	6/01/03	C	onsu	ner		Funkmaster0089@aol.com
	CA	03-1	la-34	6/01/03	D	on B	rowni	ng	9463 Shennadoah Dr.
	CA	03-1	la-35	6/02/03	В	renda	a Lus	her	brendalee 1982@juno.com
	CA	03-1	la-36	6/02/03	J	ason	Wisn	iewski	jwisniew06@hotmail.com
	CA	03-1	la-37	6/02/03	J	ason	Butt	ars	jason buttars@hotmail.com
1	CA	03-1	la-38	6/03/03	D	awna	Teed		gdteed@velocity.net
	CA	03-1	la-39	6/03/03	A	ndy	•		hogz@optonline.net
	CA	03-1	La-40	6/03/03	D	an S	outha	r	dsouthar@stny.rr.com
	CA	03-1	la-41	6/04/03	A	l De	Jong		13901 Yakima Valley
					R	ogene	e DeJ	ong	
	CA	03-1	La-42	6/04/03	C	urtis	ss Vi	ce	cdvice@copper.net
	CA	03-1	La-43	6/04/03	J	ay Ja	ckso	n	muddnlife@yahoo.com
	CA	03-1	La-44	6/04/03	A	lexaı	nder	Lindsa	y Alexander Lindsay
	CA	03-1	la-45	6/04/03	R	obb V	Nhelc	hel	robbkaty@ipa.net
	CA	03-1	La-46	6/04/03	R	onnie	e Mea	dows	rons67@charter.net
	CA	03-1	La-47	6/04/03	C	onsur	mer		GEG660@attbi.com
	CA	03-1	la-48	6/04/03	A	llan	Lync	h	allanelynch@yahoo.com
	CA	03-1	.a-49	6/04/03	В	rody	Camp	bell	Brody Campbell
	CA	03-1	.a-50	6/05/03	L	uke I	eter	son m	udboggin luke@hotmail.com
	CA	03-1	.a-51	6/05/03	C	onsun	ner	•	Asphltscr8pr@aol.com
	CA	03-1	.a-52	6/05/03	Ro	on Mo	Dani	el	mcdaniel@vtc.net
	CA	03-1	a-53	6/05/03	В	obby	0xne	ŗ	Bobby Oxner
	CA	03-1	.a-54	6/05/03	M	ike I	'oraa	son	Grantsburg, WI 54840
	CA	03-1	a-55	6/06/03	S	cott	Kova	rovics	scott_Kovarovics@tws.org

- u	DIAC IICIG	near ring	concernang has seen	ain venicies
CA	03-1a-56	6/06/03	Gary Myers	glm@mpinet.net
CA	03-1a-57	6/06/03	Darren Larkin	wooly boogers@hotmail.com
CA	03-1a-58	6/06/03	Jonathan Groner	Children's Hospital Columbus, OH
CA	03-1a-59	6/06/03	Bennett Norris	Culloden, GA 31016
CA	03 - 1a-60	6/07/03	Luke Johnson	Luke Johnson
CA	03-1a-61	6/07/03	Ernest Martinson	emartinsonl@yahoo.com
CA	03-1a-62	6/07/03	April Ross	atvmadness@hotmail.com
CA	03-1a-63	6/07/03	Gary Surdyke	gary@surdyke.com
CA	03-1a-64	6/07/03	Frank Merriman	outrider8@atbi.com
CA	03-1a-65	6/08/03	Scott Wilke	z400scott@aol.com
CA	03-1a-66	6/09/03	Michael Shute	family shute@msn.com
CA	03-1a-67	6/09/03	Dennis Hines	dennis.hines@medibuy.com
CA	03-1a-68	6/09/03	Ernest Aguilar	erniejr@mindspring.com
CA	03-1a-69	6/09/03	Roland Thompson	Roland Thompson
CA	03-1a-70	6/09/03	Andrea Liske	Andrea Liske
CA	03-1a-71	6/09/03	Jonathan Dellaira	tejas10@aol.com
CA	03-1a-72	6/09/03	Craig Baumann	djbaumann@mchsi.com
CA	03-1a-73	6/09/03	David Hughes	cherokee180@comcast.net
CA	03-1a-74	6/09/03	Mike Podhorecki	Rochester Microsystems Incorporated 90 air Park Drive, Suite 300 Rochester, NY 14624
CA	03-1a-75	6/09/03	Bobby Weiser	bore13x@yahoo.com
CA	03-1a-76	6/09/03	Jeffrey Wright j	effrey.wright@leggett.com
CA	03-1a-77	6/09/03	G. Zahariadis	gurrggreggerg@aol.com
CA	03-1a-78	6/09/03	Paul Thornton	pmthorn@concentric.net
CA	03-1a-79	6/09/03	Consumer	Ellen Pucciarelli
CA	03-1a-80	6/09/03	Chase Thompson <u>t</u>	hompson chase@hotmail.com
CA	03-1a-81	6/09/03	Erik Dubb	dubber97@msn.com

Public Field Hearin	g Concerning All-Te	rrain Vehicles
CA 03-1a-82 6/09/0	3 Bill Ingersoll	free12160@yahoo.com
CA 03-1a-83 6/09/0	3 Tom Friederick	tom 111@hotmail.com
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CA 03-1a-86 6/09/0	3 Nate Lutz	nate1765@msn.com
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CA 03-1a-101 6/09/0	3 Steven Duffy	strx400ex@yahoo.com
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CA 03-1a-105 6/09/0	3 Tegan W.	shiznikchik69@hotmail.com
CA 03-1a-106 6/09/0	3 Bill West	Westtrx107@wmconnect.com
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Public Field	Hearing C	oncerning All-Terr	ain Vehicles
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CA 03-1a-133	6/09/03	Ben	frank316@bright.net
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CA	03-1a-137	6/09/03	Ben Schmidt	ben@schmidtsignery.com
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CA	03-1a-161	6/10/03	Pierre Gagnon	pierre remi@hotmail.com
CA	03-1a-162	6/10/03	James Eckroat jin	m@mcallenconstruction.com

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CA 03-1a-165	6/10/03	Gray Steward	gshilltop@yahoo.com
CA 03-1a-166	6/10/03	Tony Madrid <u>Tr</u>	madrid@pcjcc.co.pima.az.us
CA 03-1a-167	6/10/03	Garrett Graves	tasmith68@earthlink.net
CA 03-1a-168	6/10/03	Joseph Raffiee	Durber515@aol.com
CA 03-1a-169	6/10/03	Jason McCune	Duncan400ex@att.net
CA 03-1a-170 Ltr dated 5/2	6/10/03 2	Samuel Speck Director	Ohio Department of Natural Resources 1930 Belcher Dr, Bldg D3 Columbus, OH 43224
CA 03-1a-171 Ltr dated 5/2		James Foose Chief	Pennsylvania Department of Conservation and Natural Resources Rachel Carson State Office Building P.O. Box 8552 Harrisburg, PA 17105
CA 03-1a-172	6/11/03	Matt Peltzer	mpeltzer@journey.com
CA 03-1a-173	6/11/03	Mike Lewis	Mlewis@interpower.com
CA 03-1a-174	6/11/03	Tom Waldron	Tom Waldron
CA 03-1a-175	6/11/03	Randy Martin	rmartin@net66.com
CA 03-1a-176	6/12/03	Andrew Phelps S2	220431@mail.nwmissouri.edu
CA 03-1a-177	6/12/03	David Eddy	thecarman 9@hotmail.com
CA 03-1a-178	6/12/03	Scott	Skaterp2333@aol.com
CA 03-1a-179	6/12/03	Charlie	live2ride300@yahoo.com
CA 03-1a-180 Ltr dated 6/9	6/12/03	David Scheffler ATV Outdoors Administrator	153 CR 235 Falls City, TX 78113
CA 03-1a-181	6/12/03	Gary Surdyke	802 Weaver Road Festus, MO 63028
CA 03-1a-182	6/13/03	T. Prendergast	tprender@hotmail.com

Public Field	Hearing C	oncerning All-Terr	ain Vehicles
CA 03-1a-183	6/14/03	John Goodson	1108 Naes Drive Imperial, MO 63052
CA 03-1a-184	6/16/03	Shannon Friesen Jason Friesen Susan Brown John Brown	bansheegurl@yahoo.com
CA 03-1a-185	6/16/03	Brian Potter	bkp2@attbi.com
CA 03-1a-186	6/17/03	Bill Stinson	Arizona ATV Riders, Inc Bstinson@blackboard.com
CA 03-1a-187	6/18/03	Brian McLaughlin	trx300exnj@hotmail.com
CA 03-1a-188	6/18/03	James Naccarato	jim@nacsracing.com
CA 03-1a-189	6/19/03	Ben Learned stor	nyledgefarm@riconnect.com
CA 03-1a-190 Ltr dated 6/1		Matthew Grant	2108 Skylark Dr. Waco, TX 76712
CA 03-1a-191 Ltr dated 6/1		Dustin Young President	All-Terrain Vehicle Association of Minnesota P.O. Box 557 Osseo, MN 55369
CA 03-1a-192	6/20/03	Jack Kress	869 South Hewitt Washington, PA 15301
CA 03-1a-193	6/24/03	Pam Falcioni	mail@powroll.com
CA 03-1a-194 Ltr dated 6/1	6/25/03 3	Johnny Thompson	218 Jackson Mangum, OK
CA 03-1a-195	6/25/03	L.A. Amundson	P.O. Box 1270 Sioux Falls, SD 57101
CA 03-1a-196	6/25/03	Shelby Moore Judy Moore	8410 Chipita Park Rd. Cascade, CO 80809
CA 03-1a-197 Ltr dated 6/20		Angela Rovnak	1885 S. Turner Rd. Austintown, OH 44515
CA 03-1a-198 Ltr dated 6/22		Adrienne Schiele	4809 W Gail Dr. Chandler, AZ 85226
CA 03-1a-199	6/26/03	Jennifer Lindberg	862 85 th Lane, NW Coon Rapids, MN 55433
CA 03-1a-200	6/27/03	Ken Davis	adgadg10@aaahawk.com

CA	03-1a-201	6/25/03	Rick Collignon Director	Idaho Department of Parks & Recreation P.O. Box 83720 Boise, Idaho 83720
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CA	03-1a-205	7/02/03	J. Scheeringa	scheeringal@yahoo.com
CA	03-1a-206	7/03/03	Rick Just	rjust@IDPR.state.id.us
CA	03-1a-208	6/27/03	Cary Richardson	cary@jacobyhomes.com
CA	03-1a-209	7/01/03	Mary Nutting	marynutn@localnet.com
CA	03-1a-210	7/01/03	Rich Duncan President	Castle Duncan Inc. 6655 M Amberton Dr. Elkridge, MD 21075
CA	03-1a-211	7/01/03	Dale Slagley	dslagley@charter.net
CA	03-1a-212	7/03/03	Cheri Casey	cheri@iwgraphics.com
CA	03-1a-213	7/03/03	Thomas Yager Vice President	Specialty Vehicle Institute of America 2 Jenner St, Ste 150 Irvine, CA
CA	03-1a-214	7/03/03	Doug Morris Director Approximately 2,943	All Terrain Vehicle Association P.O. Box 800 Pickerington, OH 43147
CA	03-1a-215	7/07/03	Rod Slings Rod.	Slings@dnr.state.ia.us
CA	03-1a-216	7/02/03	Cheryl Pearre Legislative Coordinator	Abate of Illinois 2403 Susan Curve Cortland, IL 60112
CA	03-1a-217	6/24/03	David Wells	12 Stark Road Pittsford, NY 14534
CA	03-1a-218	•	Chairperson	Washington State Motor- Sports Dealers Assoc. P.O. Box 1335 Lynnwood, WA 98046

CA	03-1a-219	6/25/03	Dr. L. Dolecki Chair	West Virginia Traumatic Brain and Spinal Cord Injury Rehabilitation Fund Board 955 Hartman Run Road Morgantown, WV 26505
CA	03-1a-220	6/25/03	T. Stefanko, Sr.	44 Salt Court Rittman, OH 44270
CA	03-1a-221	6/30/03	David Kryzer Lisa Kryzer	8017 Russell Ave. N Brooklyn Park, MN 55444
CA	03-1a-222	6/30/03	Jason Souders	757 Columbine Way Central Point, OR 97502
CA	03-1a-223	7/02/03	Mark Phillips	1165 Oakes Drive * Iowa City, IA 52245
CA	03-1a-224	6/25/03	David Fisher	djent4@bresnan.net
CA	03-1a-225	7/08/03	Joshua Mackenroth	6549 Mission Gorge Rd., #270 San Diego, CA 92120
CA	03-1a-226	7/09/03	Derek Hadfield	Belpre, OH
CA	03-1a-227	7/01/03	Michael Babusci Exec. Director	Pennsylvania Off Highway Vehicle Association P.O. Box 61741 Harrisburg, PA 17106
CA	03-1a-228	7/02/03	Daniel Reiff	Allegheny Trail Riders P.O. Box 134 Warren, PA 16365



United States CONSUMER PRODUCT SAFETY COMMISSION Washington, D.C. 20207

MEMORANDUM

DATE: February 2, 2004

TO : Elizabeth Leland, EC

Through: Todd A. Stevenson, Secretary

FROM : Martha A. Kosh, OS

SUBJECT: Public Field Hearing Concerning All-Terrain Vehicles

ATTACHED ARE COMMENTS ON THE __CA 03-1a

CON'T

COMMENT	DATE	SIGNED BY	<u>AFFILIATION</u>
CA03-1a-229	09/30/03	James Carlisle Coordinator	City of Allentown Bureau of Health 245 North 6 th Street Allentown, PA 18102
CA03-1a-230	10/13/03	Chris McQueen	babboyc28@hotmail.com
CA03-1a-231	10/13/03	Karen Atwood	256 Mohawk Ave Warren, PA 16365
CA03-1a-232	10/15/03	Joshua Calef	nerdski77@hotmail.com
CA03-1a-233	10/16/03	Consumer	aftershock00@msn.com
CA03-1a-234	12/02/03	Harv Forsgren Regional Forester	Dept of Agriculture 333 Broadway SE Albuqerque, NM 87102
CA03-1a-235	01/06/04	Frank Cayer	Frank.Cayer@covad.net
CA03-1a-236	01/13/04	Don Crone	1024 Mockingbird Lane Van Wert, OH 45891
CA03-1a-237	02/13/04	Nick Ramire	amped2167@yahoo.com
CA03-1a-238	4/08/04	Terese Calhoun calho	out@greatergreenville.com

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